

UNITED STATES DISTRICT COURT

for the
Southern District of New York

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

the Contents of Nine Email Accounts Located on Two
Devices Containing the Results of An Email Search
Warrant

Case No. 19 Mag. 7595

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Southern District of New York
(identify the person or describe the property to be searched and give its location):

the Contents of Nine Email Accounts Located on Two Devices Containing the Results of An Email Search Warrant

The person or property to be searched, described above, is believed to conceal (identify the person or describe the property to be seized):

See Attachment A

The search and seizure are related to violation(s) of (insert statutory citations):

18 U.S.C. § 1001 (false statements in a matter within the jurisdiction of the executive branch), 18 U.S.C. § 1346 (honest services fraud), 22 U.S.C. §§ 612, 618 (failure to register as an agent of a foreign principal violation), 18 U.S.C. § 951 (acting as an agent of a foreign government), 18 U.S.C. § 201 (bribery); and 18 U.S.C. § 203 (bribery with respect to a member of congress)

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property.

YOU ARE COMMANDED to execute this warrant on or before October 31, 2019

(not to exceed 14 days)

☒ in the daytime 6:00 a.m. to 10 p.m. ☐ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the Clerk of the Court.

☒ Upon its return, this warrant and inventory should be filed under seal by the Clerk of the Court. JPB
USMJ Initials

☒ I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box) ☒ for 30 days (not to exceed 30).

☐ until, the facts justifying, the later specific date of _____.

Date and time issued:

October 17, 2019
12:15 PM

J. Paul Oetken
Judge's signature

City and state: New York, New York

J. Paul Oetken, United States District Judge

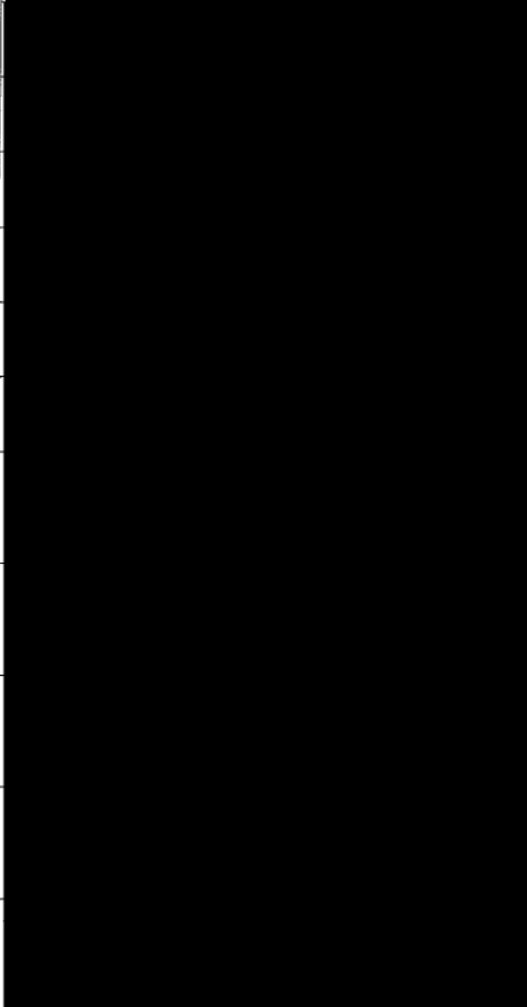
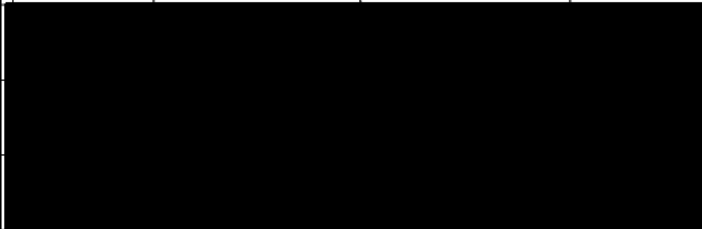
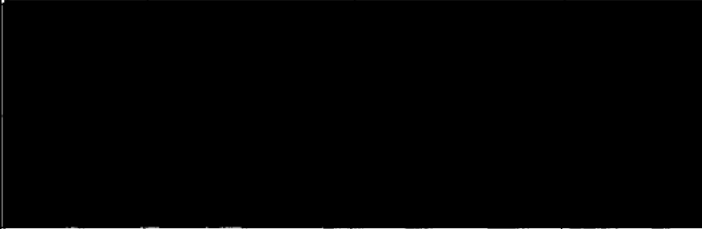
Printed name and title


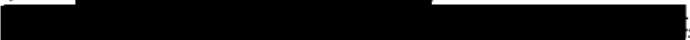
Return		
Case No.: 19 Mag. 7595	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name of any person(s) seized: 		
Certification		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the Court.</p> <p>Date: _____</p> <p style="text-align: right;">_____ <i>Executing officer's signature</i></p> <p style="text-align: right;">_____ <i>Printed name and title</i></p>		

Attachment A

I. Devices to be Searched

The devices to be searched (the "Subject Devices") are described as the electronic devices listed below which contain emails and other content information obtained pursuant to a search warrant issued on January 18, 2019 by the Honorable Sarah Netburn, numbered 19 Mag. 729.

<i>Account</i>	<i>Provider</i>	<i>Owner</i>	<i>Referred To As</i>	<i>Subject Device</i>
	Google	Igor Fruman	I-Fruman GEP Account	1
	Google	Lev Parnas	L-Parnas GEP Account	1
				
	Google	David Correia	D-Correia GEP Account	1
	Google	Igor Fruman	I-Fruman Gmail Account	1
				
	Oath	Lev Parnas	L-Parnas Yahoo Account	2
	Oath	David Correia	D-Correia Yahoo Account	2

This warrant applies only to the following accounts on the Subject Devices: the I-Fruman GEP Account, the L-Parnas GEP Account, the  the D-Correia GEP Account, the I-Fruman Gmail Account; the , the L-Parnas Yahoo Account, and the D-Correia Yahoo Account (the "Selected Accounts").

II. Review of ESI on the Selected Accounts on the Subject Devices

Law enforcement personnel (including, in addition to law enforcement officers and agents, and depending on the nature of the ESI and the status of the investigation and related proceedings, attorneys for the government, attorney support staff, agency personnel assisting the government in this investigation, interpreters, and outside vendors or technical experts under government control) are authorized to review the ESI contained on the Selected Accounts on the Subject Devices for evidence, fruits, and instrumentalities of one or more violations of 18 U.S.C. § 1001 (false statements in a matter within the jurisdiction of the executive branch), 18 U.S.C. § 1346 (honest services fraud), 22 U.S.C. §§ 612, 618 (failure to register as an agent of a foreign principal violation), 18 U.S.C. § 951 (acting as an agent of a foreign government), 18 U.S.C. § 201 (bribery); and 18 U.S.C. § 203 (bribery with respect to a member of congress) (together, the "Subject Offenses"), as listed below:

- a. Evidence related to any false statements made or caused to be made to the Federal Election Commission.
- b. Evidence relating to the May 9, 2018 letter from Congressman [REDACTED] to Secretary of State [REDACTED], including correspondence attaching or concerning the letter.
- c. Communications related to the Ukraine or with individuals associated with the government, a corporation, or a political party in the Ukraine, including [REDACTED].
- d. Communications regarding [REDACTED].
- e. Evidence, including travel records, related to meetings with foreign government officials, representatives of foreign corporations, or foreign individuals, involving Rudolph Giuliani, Lev Parnas, Igor Fruman, [REDACTED], and David Correia.
- f. Evidence of knowledge of the foreign agent registration laws and requirements, including knowledge of the requirement to register as an agent of a foreign principal.



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 17, 2019

REQUEST TO BE FILED UNDER SEAL

By Hand

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *Warrant Application Dated August 14, 2019, 19 Mag. 7595*

Dear Judge Oetken:

On January 18, 2019, the Government sought and obtained from the Honorable Sarah Netburn a sealed search warrant for the contents of eleven email accounts for campaign finance related offenses (the "January 18 Warrant Returns"), with docket number 19 Mag. 729. On August 14, 2019, the Government sought from the Honorable Henry B. Pitman, pursuant to Fed. R. Crim. P. 41, a second sealed warrant to search a subset of the January 18 Warrant Returns for evidence of certain additional foreign agent related offenses not listed in the January 18 Warrant. Judge Pitman reviewed and approved the agent affidavit in support of the August 14 warrant, a copy of which, as signed by Judge Pitman, is attached hereto. However, the Government is not presently able to locate a copy of the August 14 warrant itself, which may be the result of a clerical error, although it is possible a warrant was not submitted in connection with the August 14 application. As such, the Government respectfully requests that the Court review the attached agent affidavit, which was sworn before Judge Pitman on August 14, and issue the attached warrant which would authorize the Government to seize the materials sought in the August 14 application. Finally, the Government respectfully requests that this letter be filed under seal, as both the January 18 Warrant and August 14 warrant application are currently filed under seal.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: /s/
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Assistant United States Attorneys
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